

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

**IN RE:** : **CHAPTER 13 PROCEEDING**  
**KEN PURNELL** : **CASE NO. : 15-62523**  
**LAUREL PURNELL** : **JUDGE RUSS KENDIG**  
**DEBTOR(S)** :

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**CHAPTER 13 TRUSTEE'S OBJECTION TO CONFIRMATION  
OF DEBTOR'(S) AMENDED PLAN DATED JUNE 6, 2016**

Now comes the Standing Chapter 13 Trustee, **Toby L. Rosen**, for the above captioned case and objects to Confirmation of the Debtor'(s) proposed Plan on the grounds that said plan is in violation of 11 U.S.C. Section(s):

**Unfeasible**

1325 (a) (6) the debtor will be able to make all payments under the plan and to comply with the plan

1325 (a) (1) the plan complies with the provisions of this chapter and with the other applicable provisions of this title.

By failing to comply with 11 U.S.C. Section

1322 (d) the plan may not provide for payments over a period that is longer than three years, unless the court, for cause, approves a longer period, but the court may not approve a period that is longer than five years.

**PLAN WILL NOT COMPLETE IN 60 MONTHS  
CANNOT HAVE A PERCENTAGE AND A POT PLAN**

**WHEREFORE**, the Standing Chapter 13 Trustee prays that the confirmation of the debtor(s) plan be **denied**.

/S/ Toby L. Rosen

**Toby L. Rosen, Chapter 13 Trustee**

**CERTIFICATE OF SERVICE**

I certify that on June 10, 2016, a true and correct copy of the OBJECTION was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

WARNER MENDENHALL, on behalf of KEN and LAUREL PURNELL, at  
warnermendenhall@hotmail.com

And by regular U.S. Mail, postage prepaid, on:

NONE

/s/ Toby L. Rosen

Toby L. Rosen, Chapter 13 Trustee  
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